

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 20 CR 812
	)	
MICHAEL McCLAIN, et al.	)	Honorable Harry D. Leinenweber
	)	

**DEFENDANTS' PROPOSED STATEMENT OF THE CASE**

Defendants Michael McClain, Anne Pramaggiore, John Hooker, and Jay Doherty (“Defendants”), through their undersigned counsel, submit the following proposed statement of the case.

Defendants have been charged with

- corruptly giving, offering, and agreeing to give jobs, contracts, and monetary payments associated with those jobs and contracts, for the benefit of the former Speaker of the Illinois General Assembly, Michael J. Madigan, and his associates, with intent to influence and reward Mr. Madigan in connection with legislation affecting ComEd and its business;
- circumventing a system of internal accounting controls at Exelon and/or ComEd; and
- falsifying books, records, and/or accounts of Exelon and ComEd.

All Defendants have pleaded not guilty to all charges. Defendants deny that any actions they took were done with the corrupt intent to influence or reward Mr. Madigan in connection with legislation affecting ComEd. Defendants assert that the actions the Government contends were criminal were in fact legal and in accordance with legal lobbying practices. Defendants deny that they falsified any books, records, or accounts of Exelon or ComEd or circumvented a system of internal accounting controls.

DATED: March 6, 2023

Respectfully submitted,

/s/ Patrick J. Cotter

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